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April 24, 2026

VIA ECF
Hon. Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: ***Zirvi v. Illumina, Inc., et. al.***
Civil Action No. 23-cv-01997 (MCA)(JSA)

Dear Judge Allen:

This firm, along with Shapiro Arato Bach LLP, represents Defendant Thermo Fisher Scientific ("Thermo Fisher") in the above-referenced matter. We write on behalf of Thermo Fisher to respectfully request a 20-day extension to the deadline for Thermo Fisher to file a motion to seal and propose appropriate redactions to the materials enumerated in the Court's April 15 and 17, 2026 Orders (D.E. 152, 155). The current deadline is April 29, 2026, and this request, if granted, would extend the deadline to Thursday, May 21, 2026. Counsel for Thermo Fisher sought Plaintiff's consent, however as of the filing of this letter has not received a response.

This extension is requested to allow Thermo Fisher additional time to review and redact its confidential information from the document filed under seal (D.E. 107-7), and to coordinate and confer with counsel for Plaintiff regarding the proposed sealing. As the Court is aware from Thermo Fisher's recent submission (D.E. 154), the document at issue is a voluminous, composite exhibit, comprised of diverse materials that span a total of approximately 1,600 pages, which includes numerous communications involving counsel.

We note that the document in question has been under seal since it was originally filed by Plaintiff in November 2023. As such, we do not believe Plaintiff will be prejudiced by the brief delay. We also note that Plaintiff filed the document in question in opposition to a sanctions motion that was subsequently withdrawn without a ruling as part of the settlement reached between the parties (*see* D.E. 137).

If Your Honor approves, we respectfully request that Your Honor "So Order" this letter and have it filed on the docket. As always, we thank the Court for its attention to this matter and are available should Your Honor or Your Honor's staff require anything further.

Respectfully submitted,

/s/Liza M. Walsh

Liza M. Walsh

SO ORDERED this ___, day of _____, 2026:

_____
Hon. Jessica S. Allen, U.S.M.J.